

1 THE HONORABLE JOHN H. CHUN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 FEDERAL TRADE COMMISSION, et al.,
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11 Plaintiffs,
12 v.
13 AMAZON.COM, INC., a corporation,
14 Defendant.

Case No. 2:23-cv-01495-JHC

**SECOND DECLARATION OF LEE
ROACH IN SUPPORT OF AMAZON'S
MOTION TO SEAL PLAINTIFFS'
MOTION TO COMPEL BRIEFING
AND EXHIBITS**

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16 I, Lee Roach, declare as follows:

17 1. Since November 14, 2022, I have served in Amazon.com, Inc.'s ("Amazon")
18 Litigation Department as Corporate Counsel of Litigation and Regulatory for Amazon's
19 Competition Legal team. I am an attorney and active member in good standing licensed to practice
20 in the District of Columbia and the Commonwealth of Virginia. I have knowledge of the matters
21 set forth in this declaration, and I could and would competently testify thereto if called to do so.

22 2. I make this second declaration in support of Amazon's Motion to Seal Plaintiffs'
23 Motion to Compel Briefing and Exhibits. From the course of my duties and responsibilities, I have
24 knowledge of Amazon's business practices and its treatment of certain types of documents and
25 information as confidential—including the types of documents and information that are at issue in
26 Plaintiffs' Motion to Compel and respective briefing, as discussed in greater detail below.

SECOND ROACH DECLARATION ISO
AMAZON'S MOTION TO SEAL - 1
(Case No. 2:23-cv-01495-JHC)

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1 3. As previously explained, redactions to Exhibits C, H, and O to the Motion to
 2 Compel protect personally identifying information about non-party employees, as well as
 3 Amazon's internal data sources, and organization. The specific information disclosed, including
 4 which employees have access to which information, and which business units report to which, is
 5 not information publicly disclosed in the ordinary course. Disclosure of this information will
 6 identify specific employees and the projects they worked on and make public certain data systems
 7 Amazon does not disclose. This information is considered confidential and proprietary to Amazon,
 8 and disclosure of it may provide an advantage to Amazon's competitors by providing granular
 9 insight into how Amazon structures its business organizations.

10 4. Exhibits B, D, and O to the Motion to Compel, and excerpts of Plaintiffs' Motion
 11 discussing those exhibits, disclose confidential data sources within Amazon. Amazon's data
 12 repositories are not generally known within the company, and steps are taken to limit knowledge
 13 of and access to these sources to employees who need to know.

14 I declare under penalty of perjury under the laws of the United States of America that the
 15 foregoing is true and correct.

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17 EXECUTED this 31st day of December, 2024 in Washington, D.C.

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Lee Roach

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